

REMARKS

This Amendment is being filed in response to the Office Action of 4/30/2008 for the above-identified patent application. In this Response, Applicants have canceled claim 28. Accordingly, claims 1, 3-4, 7, and 21-27 and 29-31 will be pending after entry of this Response.

I. Rejections under 35 U.S.C. 112

In the Office Action, the Examiner rejected claims 1, 3-4, 7, 21-22, and 27-31 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. In particular, the Examiner indicated that the added limitation "target device and client device comprise separate devices" is vague. Applicants have amended the limitation to recite "target device and said remote control device are separate devices," and as the rejection may be applied to the amended limitation, Applicants respectfully traverse.

Applicants submit that the meaning of "target device and said remote control device are separate devices" is clear and supported in the application. For example, Figure 2 of the application shows a remote control device 260 which is a separate device from a target device (e.g., playback device 240), i.e., they are not the same device. The separation of the remote control device and the target device relates to the functionality of the claims since the claims relate to a remote control device for remotely controlling a target device, which can not be performed if the remote control device and the target device are the same device.

II. Rejections under 35 U.S.C. 103

In the Office Action, the Examiner rejected claims 1, 3-4, 7, and 21-31 under 35 U.S.C. 103(a) as being unpatentable over Haas et al. "Personalized News Through Content Augmentation and Profiling," Proceedings of ICIP 02, Rochester, NY, Sept. 2002 (hereinafter Haas), in view of Dimitrova et al. "Personalizing Video Recorders using Multimedia Processing and Integration," ACM 2001 (hereinafter Dimitrova).

Applicants have amended claim 1, and as the rejection might be applied to the amended claim, respectfully traverse. Claim 1 recites a method for implementing a user interface on a remote control device for remotely controlling a target device, said method comprising the steps of:

coupling a host computer device, said remote control device, and at least one target device through a wireless network, said remote control device comprising a portable wireless device having a display, the remote control device for remotely controlling said at least one target device through a user interface displayed on said display;

operating an application program on said host computer device, said application program comprising said user interface ;

transmitting, using said wireless network, from said host computer device to said remote control device, an identification of at least one scene, said scene defines an abstract layout for at least one screen display of said user interface;

generating at least one screen display for said scene based on an interpretation of said scene at said remote control device;

displaying, on said display of said remote control device, said screen display of said user interface;

receiving input, at said remote control device, from a user to initiate at least one operation at said target device;

communicating, using said wireless network, said at least one operation to said target device; and

performing said operation at said target device in response to control from said remote control device, wherein said at least one target device and said remote control device are separate devices, whereby said at least one operation performed at said target device is remotely initiated at said remote control device.

[Emphasis added.]

Haas discloses a set-top box for receiving information from a television broadcast station and the Internet for showing on a display (*see* Figures 2 and 3). Dimitrova discloses personalizing

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personal video recorders at a sub-program level (*see* abstract). The cited references, however, alone or in combination, do not disclose, teach, or even suggest the limitations of claim 1. The cited references are simply not directed towards remote control devices, and none of the cited references even mention a portable wireless remote control device having a display for remotely controlling a target device, as required in claim 1. Although Dimitrova shows a remote control icon in Figure 3, Dimitrova does not discuss the functions or operations of the remote control. It should be also noted that the remote control icon shown in Dimitrova does not show a display for displaying a user interface.

As such, none of the cited references disclose the more detailed limitations of claim 1 as well. For example, none of the cited references, alone or in combination, teach or suggest coupling a host computer device, the remote control device, and the target device through a wireless network, the remote control device having a display for remotely controlling the target device through a user interface displayed on the display, transmitting, using the wireless network, from the host computer device to the remote control device, a scene defining an abstract layout for a screen display of the user interface, generating and displaying the screen display of the user interface on the display of the remote control device, receiving user input, at the remote control device, to initiate an operation at the target device, communicating, using the wireless network, the operation to the target device, and performing the operation at the target device, wherein the target device and the remote control device are separate devices, whereby the at least one operation performed at the target device is remotely initiated at the remote control device.

The above method for implementing a remote control device for controlling a target device is advantageous in that the remote control device need not be manufactured specifically for the particular target device. Rather, a user interface for controlling the particular target device (the

functions of the user interface being software based and easily changeable) is transmitted, from a host computer running the application for the user interface, to the remote control device and displayed on the remote control device. The remote control device may then be used to remotely operate the target device by receiving input from a user to remotely initiate an operation on the target device. As such, the user interface may be transmitted to a remote device residing anywhere on the network to control various devices on the network. Thus, considerable flexibility in remotely controlling target devices is provided.

For the above reasons, Applicants submit that claim 1 is in allowable form. Claims 3-4, 7, 21, and 22 are dependent upon claim 1, and thus are allowable for at least the same reasons as claim 1. Independent claims 23 and 27 include the “portable wireless remote control device having a display” and the “remote control device and target device are separate devices” limitations of claim 1. As such, claims 23 and 27 are allowable for at least the same reasons as claim 1. Claims 24-26 are dependent upon claim 23, and thus are allowable for at least the same reasons as claim 23. Claims 29-31 are dependent upon claim 27, and thus are allowable for at least the same reasons as claim 27.

Further, the cited references also do not teach or suggest the additional limitations of claim 29, which recites:

The method as set forth in claim 28, wherein said remote control device and said target device are connected to the local home network at different points on the local home network.

[Emphasis added.]

Claim 29 further emphasizes that the remote control device and the target device are separate devices since the devices are connected at different points on the local home network.

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CONCLUSION

Based on the foregoing remarks, Applicants believe that the application is in condition for allowance. If the Examiner has any questions regarding the case, the Examiner is invited to contact Applicants' undersigned representative at the number given below.

Respectfully submitted,

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